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Witness:	*J Luebbert*
Sponsoring Party:	*MoPSC Staff*
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Case No(s):	*EO-2022-0040 / EO-2022-0193*
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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

J LUEBBERT

THE EMPIRE DISTRICT ELECTRIC COMPANY, d/b/a LIBERTY

CASE NOS. EO-2022-0040/EO-2022-0193

Jefferson City, Missouri
May 2022

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Q. Please state your name and business address.

A. My name is J Luebbert. My business address is P. O. Box 360, Suite 700, Jefferson City, MO 65102.

Q. By whom are you employed and in what capacity?

A. I am the Tariff/Rate Design Department Manager for the Missouri Public Service Commission (“Commission”).

Q. Please describe your educational background and work experience.

A. I graduated from the University of Missouri in Columbia, Missouri, with a Bachelor of Science in Biological Engineering, in May 2012. My work experience prior to becoming of member of the Missouri Public Service Commission Staff includes three years of regulatory work for the Missouri Department of Natural Resources. Prior to holding my current position, I was employed as Case Manager of the Commission Staff Division and as an Associate Engineer in the Energy Resources and Engineering Analysis Departments of the Industry Analysis Division of Commission Staff.

Q. Have you previously filed testimony before the Commission?

A. Yes, numerous times. Please refer to Schedule JL-r1, attached to this Rebuttal Testimony, for a list of the cases in which I have assisted and filed testimony with the Commission.

Q. What knowledge, skills, experience, training and education do you have in the areas of which you are testifying as an expert witness?

A. I have received continuous training at in-house and outside seminars on technical matters since I began my employment at the Commission. I have been employed by the Commission since 2016 and have submitted testimony numerous times on wide variety of issues before the Commission.

Q. Have you previously filed testimony before the Commission that is especially relevant to this proceeding?

A. Yes. During my time as a member of the Energy Resources Department, I conducted reviews of Missouri investor-owned utilities Integrated Resource Plans (IRP). As Case Manager, I was a Staff witness in the Certificate for Convenience and Necessity (CCN) case that included three Liberty acquired wind projects totaling 600 MW of nameplate capacity.[1] I also contributed to Staff's Construction Audit Report[2] for the wind projects that were the subject of the aforementioned CCN case.

EXECUTIVE SUMMARY

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to provide background on The Empire District Electric Company d/b/a Liberty ("Liberty" or "Company") decision to replace Asbury with wind resources. The context I will provide supports Staff's proposed cost allocation of the Asbury costs for which Liberty has proposed securitization within this case. Based on the background and context of the decision to retire Asbury, my testimony will provide support of

[1] Case No. EA-2019-0010.
[2] Appendix 4 - Construction Audit Report, Staff Cost of Service Report in Case No. ER-2021-0312.

Staff's proposed allocation of Asbury costs on the basis of customer energy usage as more thoroughly discussed in the rebuttal testimony of Staff witness Sarah L.K. Lange.

Q. Why is it important that the Commission consider the key aspects of the decision to retire and replace Asbury within the context of this case?

A. Consideration of the key aspects of the decision to retire and replace Asbury is important because the reasoning for the retirement of Asbury was predicated on the provision of benefits to ratepayers. Based on the testimony of various Liberty witnesses in the relevant proceedings, the benefits of the retirement of Asbury are expected to be flowed to customers through decreased SPP expense which flows through the Commission-approved Fuel Adjustment Clause (FAC) on the basis of loss adjusted energy usage. The underlying decisions to retire Asbury are premised on benefits that can, and should, match the allocation of the Asbury costs which Liberty has proposed to securitize.

DISCUSSION OF THE DECISION TO RETIRE AND REPLACE ASBURY WITH WIND ASSETS

Q. When did Liberty first propose the retirement of Asbury?

A. On October 31, 2017 Liberty filed its application (Application) for approval of its Customer Savings Plan (CSP)[3]. Within the Application, Liberty proposed the retirement of Asbury as well as replacement of Asbury's accredited capacity with the capacity attributable to 800 MW of nameplate capacity wind generating assets. Following the conclusion of Case No. EO-2018-0092, Liberty filed its applications for CCNs[4] for the acquisition of three wind projects with a total nameplate capacity of 600 MW.

[3] Case No. EO-2018-0092.
[4] Liberty filed its application for CCNs in Case No. EA-2019-0010 on October 18, 2018 and subsequently filed its application for another CCN in Case No. EA-2019-0118 which was later consolidated with Case No. EA-2019-0010.

Q. What factors were major contributors to the decision to retire and replace Asbury with wind assets based upon the testimony of Liberty witnesses?

A. Liberty's decision to retire and replace Asbury with wind assets was heavily influenced by the potential of off-system sales revenue from the wind assets, the reported decline of the economics of continued Asbury operation, and the opportunity to "green" the generation portfolio of the utility. Several Liberty witnesses have provided testimony supporting the aforementioned narratives within the context of several cases before the Commission.[5] In my testimony below, I will provide and explain the relevance of the testimonies of Liberty witnesses in the cases filed before the Commission beginning with the CSP docket and ending with this case.

LIBERTY'S CUSTOMER SAVINGS PLAN (EO-2018-0092)

It is important to understand that prior to Liberty filing its application for approval of the CSP, Liberty's preferred plan[6] included the operation of Asbury through the end of its expected useful life in 2035. In Case No. EO-2018-0092, Liberty witness James McMahon explained that one of the major drivers of the differences in the findings of the Generation Fleet Savings Analysis (GFSA) which was conducted in support of the filing in that case and Liberty's 2016 IRP was that the "the new analysis modeled the SPP[7] Integrated Marketplace, reducing restrictions on the amount of wind that could be built by Empire and

[5] Testimony of Liberty witnesses from Case Nos. EO-2018-0092, EA-2019-0010, EO-2022-0193.

[6] Liberty's preferred plan as stated within the company's 2016 Triennial Compliance Filing pursuant to 4 CSR 240-22. Case No. EO-2016-0223.

[7] Southwest Power Pool.

the availability of energy sales to the market…"[8] Mr. McMahon went on to explain that in the GFSA, Liberty:

> . . . **constrained the amount of wind that could be built to prevent the model from building an unlimited amount of capacity that relies on market sales to offset upfront capital costs**. In the past, Empire placed maximum capacity limits on wind based on minimum load levels to match low-variable cost resource output with the shape of Empire's native load. This was done in an attempt to match supply and demand during minimum load hours. This, in effect, would mitigate the amount of excess supply that the utility would have available during low-demand off-peak periods. However, with **the implementation of the SPP Integrated Marketplace, physical restrictions on off-peak energy production are no longer constraining, since all generation is sold into the wholesale market**. Nevertheless, **relying solely on off-system sales to manage costs introduces risk, so Empire constrained the model** to cap total nameplate wind capacity in the portfolio… **the constraint of up to 800 MW of new wind still allows for these additions to replace a sizeable portion of the Asbury capacity that may retire**, while delaying the need for future fossil-fired capacity builds.[9] **[Emphasis added.]**

Mr. McMahon further explained that "Most of the cost of continuing to operate Asbury (almost $25/MWh) is associated with fuel, with the significant ongoing operations and maintenance and capital costs making up the balance of the $38/MWh estimate."[10] Mr. McMahon, and ultimately Liberty, concluded that "the cost of acquiring new wind resources is lower than the cost of operating and maintaining the existing Asbury coal plant."[11]

Q. What does the testimony you just cited illustrate?

A. The testimony of Mr. McMahon, which I cited, explains an important aspect of the GFSA, namely the assumption that energy produced by Liberty generating units will be

[8] Pages 9-10 of the Direct Testimony of Liberty witness James McMahon in Case No. EO-2018-0092.
[9] Pages 22-23 of the Direct Testimony of Liberty witness James McMahon in Case No. EO-2018-0092.
[10] Pages 38-39 of the Direct Testimony of Liberty witness James McMahon in Case No. EO-2018-0092.
[11] Ibid.

sold in the SPP Integrated Marketplace (IM) regardless of the need to serve the needs of Liberty native load or fulfilling existing bilateral contracts. The results of the GFSA, and Liberty's subsequent IRP analyses, were heavily influenced by the ability of Liberty to earn off-system sales revenues.

Q. What are off-system sales revenues (OSSR) and why are they relevant to this case?

A. As an SPP IM participant, Liberty provides daily offer curves of its various generating resources to SPP. In turn, SPP dispatches generating units throughout the SPP footprint based upon a security constrained economic dispatch model. Liberty receives revenue whenever one of its generators is selected and run by SPP as a cost-effective generator (SPP Sales). Liberty then purchases energy from the IM to meet its retail customers' load requirements, in other words, the SPP purchased power. OSSR represents the revenue Liberty receives for energy it generates over and above the load requirements of its captive retail customers. OSSR is simply SPP Sales minus SPP purchased power. As discussed in more detail in the rebuttal testimony of Staff witness John A. Rogers in Case No. EO-2018-0092, because of Liberty's participation in SPP IM and the requirement to purchase enough energy to meet retail load requirements, the annual purchased power expense is approximately equal in a given year for the plans highlighted in his testimony.[12] Given the nature of the wind assets[13] being modeled, the benefits to ratepayers would be made possible through large rate base additions (wind assets) combined with assumed decreases in fuel

[12] These included Liberty's preferred plan, a plan that did not retire Asbury, and a plan that included both the addition of wind assets and continued operation of Asbury.
[13] Owned wind assets require large upfront capital investments, but do not incur fuel costs as a traditional supply-side resource such as a coal-fired power plant would.

expense due to the retirement of Asbury and inclusion of large increases in OSSR from the wind assets. This market dynamic being included in the analysis is important to note because it results in plans that do not necessarily seek to serve the native load of Liberty ratepayers, but to maximize SPP sales and minimize fuel and purchased power expense. Given the assumptions utilized in the GFSA for the levelized cost of energy of wind assets and the assumed market prices, a modeling constraint was necessary to prevent the model from building an unlimited amount of capacity that relies on market sales to offset upfront capital costs which would have introduced additional risk to Liberty ratepayers.

Q. Briefly explain why the interaction of Liberty as an SPP IM participant is relevant to the cost allocation of Asbury costs which are the subject of this case.

A. Liberty's decision to retire and replace Asbury was predicated on the analysis within the GFSA which estimated benefits to ratepayers. The modeled benefits of the additional SPP sales from the wind assets replacing Asbury and the decreased fuel expense resulting from the retirement of Asbury were expected to be flowed to customers through the Commission approved FAC on the basis of loss adjusted energy usage. The underlying decisions to retire Asbury were premised on benefits that can, and should, match the allocation of the Asbury costs which Liberty has proposed to securitize.

Q. Did any other Liberty witnesses provide testimony in the CSP docket that is relevant to the discussion in this case?

A. Yes. Liberty witnesses Gregory E. Macias, Blake A. Mertens, and David R. Swain provided additional context that is relevant to this case.

In his direct testimony Mr. Macias discussed the estimated rate impacts that result from the CSP based on jurisdictional and class allocations. As it pertained to the benefits of the retirement of Asbury, Mr. Macias testified that,

> . . . The absence of future SPP revenues associated with off-system sales from the Asbury plant (due to its retirement) should be offset by the absence of future fuel costs associated with the production of energy. Therefore, **all of the Benefits category for Asbury (fuel and SPP revenues) are appropriately allocated based on an energy-related allocation factor**.[14] **[Emphasis added.]**

Mr. Macias' representation of the benefits of retiring Asbury is consistent with Staff's position that securitized costs of Asbury be allocated on the basis of customer energy usage because doing so ties the benefits of the decision to retire the Asbury plant to the allocation methodology of the costs.

Mr. Mertens provided the following testimony with respect to Asbury operations:

> . . . While Asbury has consistently exhibited an availability factor in excess of 90% and a low forced outage rate, today, **due to its age, its heat rate (*i.e.*, efficiency) is not as competitive as new, larger coal-fired facilities thus impacting its dispatch profile in the SPP market.** In fact, over the last few years, it has seen short periods of economic shutdown that it had not seen throughout its history due to low cost natural gas and wind generation available in the SPP Integrated Marketplace.[15] **[Emphasis added.]**

Mr. Mertens then described that Liberty's plan would be to replace Asbury's accredited capacity with the accredited capacity associated with the new wind generation resources included in the GFSA.[16]

[14] Page 6 of the Direct Testimony of Liberty witness Gregory E. Macias in Case No. EO-2018-0092.
[15] Pages 12-13 of the Direct Testimony of Liberty witness Blake A. Mertens in Case No. EO-2018-0092.
[16] Page 16 of the Direct Testimony of Liberty witness Blake A. Mertens in Case No. EO-2018-0092.

David R. Swain, President of Liberty Utilities' Central Region, provided context for Liberty's plan to "green" the generation portfolio of the utility. In his testimony provided in Case No. EO-2018-0092 Mr. Swain testified that,

> . . . the purpose of the plan is to achieve customer savings; **these customer savings come from revenues received from wind energy sold into the SPP Integrated Marketplace, as well as from fuel savings** associated with offering low variable cost wind generation into the SPP. Empire is proposing this plan because, **when partnered with the retirement of Asbury, it will result in a reduction in customer rates** over the next 20 years. Finally, it provides Empire with the opportunity to replace coal fired generation with a cleaner, cheaper resource that will not require ongoing environmental compliance investments in the future.[17]
>
> In addition, this **new plan provides the Company with the opportunity to "green" its generation portfolio and invest in clean and renewable energy resources**.[18] **[Emphasis added.]**

The cited testimony of Liberty witnesses on the decision to retire and replace Asbury support Staff's proposed allocation methodology of Asbury costs in this case.

Q. Your testimony includes several references to discussion of Liberty's recently acquired wind assets. Please explain why the discussion regarding the wind assets is relevant to the decision regarding the allocation of cost of the Asbury plant.

A. The discussion regarding the wind assets is relevant to the allocation of Asbury costs because Liberty's plans to retire the plant originated and continued with the decision to move forward with the acquisition of a large amount of wind generation. Mr. Swain explained the link between the retirement and replacement of Asbury in the following excerpts from his testimony:

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[17] Page 11 of the Direct Testimony of Liberty witness David R. Swain in Case No. EO-2018-0092.
[18] Page 14 of the Direct Testimony of Liberty witness David R. Swain in Case No. EO-2018-0092.

> Q. **HOW IS THE RETIREMENT OF ASBURY FACILITY LINKED WITH THE ADDITION OF WIND GENERATION?**
>
> A. Quite simply, **the Generation Fleet Savings Analysis shows that customers can save the most by together acquiring wind generation and retiring Asbury.** In addition, the generating capacity recognized by SPP when adding 800 MW of additional wind will largely offset the reduction in accredited capacity caused by the Asbury retirement. As Mr. Mertens explains, **Empire will ensure that the new wind generation facilities are Network Resources under the SPP tariff and will ensure that SPP maximizes the amount of capacity the new wind farms provide to Empire's capacity margin requirements. [Emphasis added.]**
>
> "While Empire can continue to operate Asbury and forego additional investment in wind generation, it is not a plan that makes sense in light of the opportunity to achieve significantly larger customer savings through the Customer Savings Plan."[19]

Put simply, the decision to retire Asbury was linked to and heavily influenced by the decision to move forward with the acquisition of a large amount of wind resources. The accredited capacity of the new wind resources offset a large portion of the accredited capacity lost due to the decision to retire the Asbury plant. The capacity deficit offset was necessary for Liberty to continue to meet SPP resource adequacy requirements. The potential benefits of the wind additions and subsequent retirement of Asbury will largely be realized through reductions in SPP expense due to decreased fuel costs (retirement of Asbury) and increased OSSR from the injection of large amounts of energy attributable to the wind assets.

LIBERTY WITNESS TESTIMONY IN THIS CASE

Q. Did any Liberty witnesses provide testimony within the context of this case that are consistent with the previous representations of Liberty personnel and further support Staff's position on the allocation of Asbury costs on the basis of customer energy usage?

[19] Pages 16-17 of the Direct Testimony of Liberty witness David R. Swain in Case No. EO-2018-0092.

A. Yes. In his direct testimony in this case Liberty witness Aaron J. Doll explained that:

> "The evaluation of Asbury's ongoing useful life given market conditions, the lower cost of wind, and the avoidance of additional environmental compliance-related investment in Asbury, was first conducted by Charles River Associates ("CRA") in the Generation Fleet Savings Analysis ("GFSA"). The results of the GFSA indicated that the investments that would be required for compliance with the CCR rules could not be justified because of Asbury's economic obsolescence, as evidenced by its performance in the SPP IM. Instead, the study showed that Asbury should be retired since there were less expensive ways for Liberty to serve its load."[20]

He then continued on to explain that in the course of the 2019 Liberty IRP, the Company determined that retiring Asbury would result in customer savings.[21]

In his direct testimony in this case, Liberty witness Frank C. Graves discusses the retirement of Asbury. Throughout his direct testimony, Mr. Graves states or concludes several points that are relevant to the determination of the allocation of the Asbury costs for which Liberty has requested securitization:

> "The retirement of Asbury was reasonable in light of changes in the recent industry outlook of key market fundamentals and resulting benefits for Liberty's customers."[22]

> "The evolution of the comparative value of the plant to the system over time, indicates retaining Asbury was preferred to retirement until 2016, but starting in 2017 and thereafter the retirement of Asbury became and remained less expensive."[23]

> "The economic benefit of the Asbury plant to the system began to deteriorate around 2015, due to both plant-specific factors such as

[20] Page 16 of the Direct Testimony of Liberty witness Aaron J. Doll in Case No. EO-2022-0193.
[21] Ibid.
[22] Page 3 of the Direct Testimony of Liberty witness Frank C. Graves in Case No. EO-2022-0193.
[23] Page 10 of the Direct Testimony of Liberty witness Frank C. Graves in Case No. EO-2022-0193.

> operating cost per megawatt hour ("MWh"), and market conditions altering its utilization and profitability (benefits to customers) at prevailing market prices in the SPP."[24]

> "Plan 4, in which Asbury was to be retired at the end of 2019… was selected as the Company's Preferred Plan, leading to the situation faced in this proceeding as to how to address the recovery of its undepreciated past investment costs."[25]

A recurring theme throughout Mr. Graves' testimony is that Liberty's decision to retire Asbury was tied to the declining economics of continued operation of the plant in the SPP IM compared to renewable energy resources that do not cause incurred fuel expense. The analyses were driven by the forecasted SPP market prices which impacts both Liberty's cost to serve native load and the dispatch of supply-side resources. Once the company conducted the GFSA and applied for Commission approval of the CSP, Liberty's analysis[26] continued to prefer early retirement of Asbury and the addition of renewable resources.

Q. Mr. Graves' direct testimony discusses the prudency of the decision to invest in Air Quality Control System for Asbury and the subsequent retirement of the plant. Are you challenging the prudency of decision making processes as they relate to Asbury with your testimony in this case?

A. I am not. I merely cite to Mr. Graves testimony because the underlying statements and conclusions are relevant for Commission consideration of the appropriate allocation of Asbury costs within the context of this case.

CONCLUSION

Q. What conclusions should be drawn based upon the testimony provided?

[24] Page 11 of the Direct Testimony of Liberty witness Frank C. Graves in Case No. EO-2022-0193.
[25] Pages 11-12 of the Direct Testimony of Liberty witness Frank C. Graves in Case No. EO-2022-0193.
[26] Including the subsequent analyses associated with Liberty IRP updates.

A. Based upon the testimony and representations provided by various company witnesses and the resulting outcomes of the decision to retire and replace Asbury with 600 MW of nameplate capacity wind resources, the following conclusions should be clear:

1. The decision to retire Asbury was linked to the decision to move forward with the acquisition of the wind projects.
2. Liberty's plan included the replacement of the majority of the capacity deficit created by the retirement of Asbury with the accredited capacity of the wind assets.
3. The benefits of retiring and replacing Asbury with the wind assets were projected by Liberty to be realized by ratepayers through decreased SPP expense which, if realized, will flow to ratepayers through Liberty's Commission approved Fuel Adjustment Clause which is recovered on the basis of loss adjusted energy usage.
4. Staff's recommended allocation of Asbury costs on the basis of customer energy usage ties the expected benefits of the decision to retire and replace the Asbury plant with the allocation of the remaining costs.

Q. Does this conclude your rebuttal testimony?

A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Petition of The Empire District Electric Company d/b/a Liberty to Obtain a Financing Order that Authorizes the Issuance of Securitized Utility Tariff Bonds for Qualified Extraordinary Costs	)))))	Case No. EO -2022-0040
In the Matter of the Petition of The Empire District Electric Company d/b/a Liberty to Obtain a Financing Order that Authorizes the Issuance of Securitized Utility Tariff Bonds for Energy Transition Costs Related to the Asbury Plant	))))))	Case No. EO-2022-0193

AFFIDAVIT OF J LUEBBERT

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW J LUEBBERT and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of J Luebbert;* and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

J Luebbert

J LUEBBERT

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 11th day of May, 2022.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377

Dianna L. Vaught

Notary Public

Case Participation of
J Luebbert

Case Number	Company	Issues
EO-2015-0055	Ameren Missouri	Evaluation, Measurement, and Verification
EO-2016-0223	Empire District Electric Company	Integrated Resource Planning Requirements
EO-2016-0228	Ameren Missouri	Utilization of Generation Capacity, Plant Outages, and Demand Response Program
ER-2016-0179	Ameren Missouri	Heat Rate Testing
ER-2016-0285	Kansas City Power & Light Company	Heat Rate Testing
EO-2017-0065	Empire District Electric Company	Utilization of Generation Capacity and Station Outages
EO-2017-0231	Kansas City Power & Light Company	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2017-0232	KCP&L Greater Missouri Operations Company	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2018-0038	Ameren Missouri	Integrated Resource Planning Requirements
EO-2018-0067	Ameren Missouri	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2018-0211	Ameren Missouri	Avoided Costs and Demand Response Programs
EA-2019-0010	Empire District Electric Company	Market Protection Provision
GO-2019-0115	Spire East	Policy
GO-2019-0116	Spire West	Policy
EO-2019-0132	Kansas City Power & Light Company	Avoided Cost, SPP resource adequacy requirements, and Demand Response Programs
ER-2019-0335	Ameren Missouri	Unregulated Competition Waivers and Class Cost Of Service
ER-2019-0374	Empire District Electric Company	SPP resource adequacy
EO-2020-0227	Evergy Missouri Metro	Demand Response programs
EO-2020-0228	Evergy Missouri West	Demand Response programs
EO-2020-0262	Evergy Missouri Metro	Demand Response programs
EO-2020-0263	Evergy Missouri West	Demand Response programs

Case Number	Company	Issues
EO-2020-0280	Evergy Missouri Metro	Integrated Resource Planning Requirements
EO-2020-0281	Evergy Missouri West	Integrated Resource Planning Requirements
EO-2021-0021	Ameren Missouri	Integrated Resource Planning Requirements
EO-2021-0032	Evergy	Renewable Generation and Retirements
GR-2021-0108	Spire Missouri	Metering and Combined Heat and Power
ET-2021-0151	Evergy	Capacity costs
ER-2021-0240	Ameren Missouri	Market Prices, Construction Audit, Smart Energy Plan, AMI
ER-2021-0312	Empire District Electric Company	Construction Audit, Market Price Protection, PISA Reporting